



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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ERPP

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Lester Snow
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, California 95814

Subject: Comments on the CALFED Ecosystem Restoration Plan

Dear Mr. Snow:

We have reviewed the CALFED Ecosystem Restoration Program Plan (Volumes 1, 2, and 3) and have the following general and specific comments.

General Comments

We support the general objectives of the Ecosystem Restoration Program Plan (hereafter ERPP), which are to restore ecosystem health and improve water management within the Bay-Delta system and areas upstream that have been adversely affected by prior water development. The Bureau of Land Management is a cooperator in the Riparian Habitat Joint Venture (RHJV), a consortium of Federal and State resource management agencies and private conservation organizations whose goal is to protect, enhance, and restore riparian habitats for California's resident and migratory birds. We concur with the theme of the RHJV's comments on the ERPP, which is that the plan focuses almost exclusively on listed aquatic species and water considerations and largely ignores the needs of other vital wildlife groups, including resident and migratory birds. Specific concerns of the RHJV that we believe need to be reinforced or highlighted include:

- ▶ The needs of aquatic species, relative to the areal extent, size, configuration, fragmentation, species composition and management of riparian forest/shrub habitat are different from the needs of avian species. Relying solely on the needs of aquatic species to guide riparian restoration actions could result in negative impacts to avian populations, thereby sowing the seeds for future endangered species conflicts by creating population sinks.
- ▶ Bird species nesting in narrow belts of vegetation typically experience higher predation rates, higher parasitism rates from brown-headed cowbirds, and increased interspecific competition. Mature overstory with well-developed understory vegetation is needed to provide thermal cover, migration corridors, and diverse nesting and feeding opportunities for wildlife.

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- ▶ Buffer areas that do not provide sufficient riparian habitat to sustain bird populations can create a drain on adjacent populations if the sink habitats (i.e. areas where not enough young are produced to offset adult mortality) are preferentially used over adjacent source habitats.
- ▶ Aerial photos showing the extent of habitat do not provide definitive information about the quality of the habitat without ground-truthing. Bird populations should be measured and monitored themselves to provide a reliable indication of their status and trends.
- ▶ Birds, because of their diverse ecological needs and high position on the food chain, provide an excellent measure of overall habitat quality. Birds can be monitored by standardized methods such that comparisons can be made between sites and management prescriptions.
- ▶ None of the ecosystem restoration targets or programmatic actions recommended in the ERPP should have the potential to cause detrimental effects to other species that are not currently considered priority species.

Specific Comments

VOLUME 1

Page 4: In addition to the immediate focused research suggested under item #3, long term studies are needed to evaluate the dynamics of restoration sites that change considerably over time (i.e. different successional stages have different values to different species).

Page 116-120: Species and Species Group Visions should be developed for all of the major species guilds (e.g. raptors, divers, non-endangered rails, waterbirds such as grebes, loons, and cormorants). Resident landbirds (i.e. those that are not neotropical migrants) are not included in the current list and should be. While neotropical migrants are identified as a broad guild, a subset of declining riparian birds needs special attention. We recommend that the list of priority riparian birds developed by the RHJV be adopted by the ERPP and included as priority species in Table 8.

Page 220: Habitat conversion should be included on the list of major stressors. This stressor is implicitly recognized in the vision summary for the ecosystem element of agricultural lands. The ERPP encourages production of crop types that provide high wildlife habitat value, without recognizing that certain water policies may promote conversion of grain and vegetable crops to permanent crops such as orchards and vineyards. Such permanent crops are inherently less valuable as habitat for wildlife. It should also be recognized that flooding can be essential to maintaining the diversity of riparian plant communities. The disturbance caused by normal spring flooding increases plant diversity and the regeneration of a thick understory that nesting birds rely upon.

VOLUME 2

Page 69: The rationale for "Neotropical Migratory Birds" should consider the needs of migrants as well as breeding species. Migratory landbirds that do not breed in the Central Valley use riparian habitats for feeding and shelter during migration. These stopover sites are critically important during passage to and from wintering areas. A landbird will be able to meet its energy needs during migration only if it encounters habitat of suitable quality enroute. We recommend expanding the rationale to include a discussion of pure migrants and extend the period of use from May until September to April until October.

Page 91: The target widths for riparian habitat are too narrow. Each site should be considered on its own merits and restoration criteria developed that are based on the qualities of the site.

Pages 115-122: On page 115, the ERPP acknowledges that riparian habitats in the Central Valley along the Sacramento River historically averaged four to five miles wide. Yet on page 122, a restoration target of "generally greater than 100 yards wide" is all that is called for to support neotropical migratory bird species. Recent data from a number of regions suggest that many, if not most, populations of area-sensitive species occurring in narrow riparian corridors or small habitat fragments are not producing young at a rate that matches natural mortality.¹

VOLUME 3

Page 29: The ranking criteria are too narrowly focused on fish. Extirpated bird species, including warbling vireo, yellow warbler, song sparrow, and Bell's vireo, also require special attention and should be given a first level ranking. The rationale should be expanded to acknowledge that these and other priority bird species require special attention.

Page 35: Monitoring methods should be defined and standardized at all phases of ERPP implementation. Establishing standardized methods for avian species will facilitate comparison of diverse projects and make it possible to establish a centralized database.

Page 75: Neotropical Migratory Bird Guild, Data Requirements should include establishment of current population levels (or indices) and trends and a program to track these population levels and trends. Evaluation of the extent of habitat using aerial photographs is not sufficient to determine whether the goal of increased bird populations is being achieved.

Page 77: Focused Research should include more on Ecosystem Elements. Intensive terrestrial monitoring (over years) such as bird banding and point count stations should be used to evaluate the long term success of restoration sites and to develop management options for improved restoration efforts.

¹Martin, Thomas E. and Deborah M. Finch, eds. 1995. Ecology and Management of Neotropical Migratory Birds, A Synthesis and Review of Critical Issues. Oxford University Press, New York.

The above highlights identify the principal areas where we believe the ERPP needs to be supplemented and strengthened. We appreciate the opportunity to review the draft ERPP and would like to be kept informed of CALFED activities to update the plan. Technical questions regarding our comments and recommendations may be directed to Ed Lorentzen at 916-978-4646.

Sincerely,



Ed Hastey
State Director